

Counsel listed on next pages

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Jeremy Stanfield, Romonia Persaud, and
Shabnam Sheila Dehdashtian, individually, on
behalf of all others similarly situated, and on
behalf of the general public,

Plaintiffs,

v.

First NLC Financial Services, LLC, and
DOES 1 through 50 inclusive,

Defendants.

Case No. C 06-3892 SBA JL

**STIPULATION AND [PROPOSED]
ORDER CONTINUING PHASE ONE
DISCOVERY CUT-OFF DATE
CIV. L.R. 6-2(a)**

Judge: Hon. Sandra B. Armstrong

Date Action Filed: June 22, 2006

PETER RUKIN (State Bar No. 178336)
JOHN HYLAND (State Bar No. 178875)
RUKIN HYLAND DORIA & TINDALL, LLP
100 Pine Street, Suite 725
San Francisco, CA 94111
Telephone: (415) 421-1800
Facsimile: (415) 421-1700

DONALD H. NICHOLS (MN State Bar No. 78918)
(Admitted *pro hac vice*)
PAUL J. LUKAS (MN State Bar No. 22084X)
(Admitted *pro hac vice*)
NICHOLS KASTER & ANDERSON, PLLP
100 Pine Street, Suite 725
San Francisco, CA 94111
Telephone: (415) 421-1800
Facsimile: (415) 421-1700

BRYAN J. SCHWARTZ (State Bar No. 209903)
NICHOLS KASTER & ANDERSON, LLP
One Embarcadero Center
301 Clay Street, Suite 720
San Francisco, CA 94111
Telephone: (415) 277-7236
Facsimile: (415) 277-7238

Attorneys for Individual and Representative Plaintiffs

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TIMOTHY J. LONG (State Bar No. 137591)
ORRICK, HERRINGTON & SUTCLIFFE LLP
400 Capitol Mall, Suite 3000
Sacramento, California 95814
Telephone: (916) 447-9200
Facsimile: (916) 329-4900
E-mail: tjlong@orrick.com

MICHAEL D. WEIL (State Bar No. 209056)
KATINA B. BOOSALIS (State Bar No. 244914)
ORRICK, HERRINGTON & SUTCLIFFE LLP
405 Howard Street
San Francisco, CA 94105
Telephone: (415) 773-5700
Facsimile: (415) 773-5759
E-mail: mweil@orrick.com
E-mail: kboosalis@orrick.com

STEPHEN G. MORRISON (Admitted *Pro Hac Vice*)
NELSON MULLINS RILEY & SCARBOROUGH LLP
Meridian, 17th Floor
1320 Main Street
Columbia, SC 29201
Telephone: (803) 255-9410
Facsimile: (803) 255-9472
E-mail: steve.morrison@nelsonmullins.com

KENNETH E. YOUNG (Admitted *Pro Hac Vice*)
NELSON MULLINS RILEY & SCARBOROUGH LLP
100 N. Tryon Street, 42nd Floor
Charlotte, NC 28202
Telephone: (704) 417-3041
Facsimile: (704) 417-3012
E-mail: ken.young@nelsonmullins.com

Attorneys for Defendant
First NLC Financial Services, LLC

PURSUANT TO LOCAL RULE 6-2(a), Plaintiffs Jeremy Stanfield, *et al.* and Defendant First NLC Financial Services, LLC (collectively, “the parties”) stipulate as follows:

WHEREAS, the December 21, 2006 Order For Pretrial Preparation sets the Phase One class certification discovery cut-off as April 14, 2007;

WHEREAS, the parties have discovered that the original list of putative class members was missing putative class members;

WHEREAS, the parties have agreed, upon Court approval, to conduct a second mailing of the Court-approved notice and conduct a second sixty-day opt-in period for individuals missing from the original class list;

WHEREAS, the parties stipulate that plaintiffs can amend their complaint to include a fourth job title, Branch Processor;

WHEREAS, the parties stipulate that individuals in the Branch Processor title may receive notice of this collective action and have a sixty day period to opt into the class;

WHEREAS, the parties have been conducting written and deposition discovery and have several depositions on calendar through March and beginning in April;

WHEREAS, the parties stipulate that the Phase One discovery cut-off should be continued to June 12, 2007;

WHEREAS, the parties have not sought any other modifications to the schedule for the case; and

WHEREAS, the parties’ stipulation should not affect the other dates in the Court’s Order For Pretrial Preparation;

WHEREAS, nothing by this stipulation or any other written or oral agreement by First NLC shall be construed as an admission or a waiver that class certification or a collective action for any of these job positions identified in plaintiffs’ complaints or in this case is appropriate;

IT IS HEREBY STIPULATED by and between the parties to this action through their designated counsel as follows:

1 The parties respectfully request that this Court modify Paragraph A of the December 21, 2006
2 Order For Pretrial Preparation as follows "All phase one discovery, except for expert discovery,
3 shall be completed and all depositions taken on or before **6/12/07**. The parties are responsible for
4 scheduling discovery so that motions to resolve discovery disputes can be heard before the above
5 discovery cut-off."

6 Dated: March 12, 2007

NICHOLS KASTER & ANDERSON, LLP

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9 By: /s/
Bryan J. Schwartz
10 Attorneys for Plaintiffs and Representative Plaintiffs

11 Dated: March 12, 2007


12 ORRICK, HERRINGTON & SUTCLIFFE LLP
13 NELSON MULLINS RILEY & SCARBOROUGH
14 LLP

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16 By: /s/
Michael D. Weil
17 Attorneys for Defendant
First NLC Financial Services, LLC

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19 **ORDER**

20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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23 Dated: 3/15/07


24 Honorable Sandra B. Armstrong
United States District Court Judge